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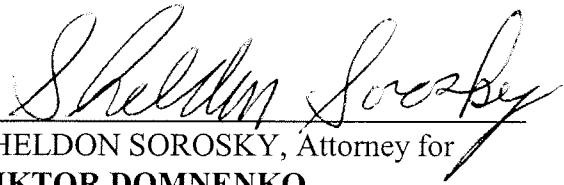
**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)
)
) No. 08 CR 179
Vs.)
) Judge Charles Norgle
OLANREWAJU J. OKULAJA, et al)

NOTICE OF MOTION

**TO: United States Attorneys Office
219 S. Dearborn Street, Room 500
Chicago, IL. 60604
Attention: Diane Mac Arthur**

On November 20, 2009, at 10:00 A.M., Defendants, **VIKTOR DOMNENKO** and **LILYA DOMNENKO** will appear before **United States District Court Judge Charles Norgle** at 219 S. Dearborn, Chicago, Illinois, Room 2341, and present this attached **MOTION OF DEFENDANTS VIKTOR DOMNENKO AND LILYA DOMNENKO TO MODIFY BAIL AND SELL CERTAIN PARCELS OF REAL ESTATE.**



SHELDON SOROSKY, Attorney for
VIKTOR DOMNENKO.

SHELDON SOROSKY
LAW OFFICE OF SHELDON SOROSKY, LTD.
158 W. ERIE STREET
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UNITED STATES OF AMERICA)
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Vs.

**MOTION OF DEFENDANTS VIKTOR DOMNENKO
AND LILYA DOMNENKO TO MODIFY BAIL AND
SELL CERTAIN PARCELS OF REAL ESTATE**

Defendants, **LILYA DOMNENKO and VIKTOR DOMNENKO**, through their
respective attorneys, SHELDON BANKS and SHELDON SOROSKY, hereby request that this
Court enter an order, amending a condition of each Defendant's bail and allow each Defendant to
participate in the sale of a certain parcel of real estate, and in support thereof states as follows:

BAIL ORDER

1. The Defendant's bail prohibits them from selling any real estate.

**THE DEFENDANT'S ECONOMIC NECESSITY
TO SELL TWO PIECES OF REAL ESTATE**

2. There are two parcels of real estate wherein each Defendant has an ownership interest;
however, each Defendant has lacked sufficient funds to make the monthly mortgage payments on
these properties, and both pieces of real estate are in "foreclosure."

**PROPERTY LOCATED AT
1510 FOOTHILL DRIVE
WHEATON, ILLINOIS**

3. The property at 1510 Foothill Drive, Wheaton, Illinois, is a single family home; the Defendants presently reside in this house.

4. This property is presently in foreclosure.

5. This house is owned in the name of **LILYA DOMNENKO**; this house is not a parcel of real estate that is referred to in the instant indictment.

6. The mortgage holder on this property is Chase Bank.

7. **LILYA DOMNENKO** presently owes Chase Bank approximately \$1,500,000.00 on this property; she lacks sufficient funds to make any payments on this home.

8. This home is going to be sold pursuant to a “sheriff’s sale” of the DuPage County, Illinois Sheriff in December in 2009.

9. **LILYA DOMNENKO** is seeking the permission of this Court to participate in the “sheriff’s sale” of this property.

10. All the proceeds from the sale of this home will first go to Chase Bank.

**PROPERTY LOCATED AT
5134 SOUTH INGLESIDE
CHICAGO, ILLINOIS**

11. There is an apartment building on this property; the building contains 13 residential units.

12. This building is presently owned by a corporation; however, the owners of this corporation are **VIKTOR DOMNENKO** and Paul Savenok.

13. Paul Savenok and this piece of real estate are not involved in this indictment.

14. This building is presently in foreclosure.

15. The mortgagee on this building is Village Bank and Trust (hereafter "Village Bank").

15. **VIKTOR DOMNENKO** and Paul Savenok presently owe Village Bank approximately \$2,600,000.00 on this building; they lack sufficient funds to make the required mortgage payments to Village Bank.

17. Village Bank has approved a "short sale" of this property; in this "short sale" **VIKTOR DOMNENKO** and Paul Savenok would sell this property for \$1,050,000.00 to a buyer, Jei Zhong Lei, LLC.

18. However, the entire purchase price of \$1,050,000.00 would go to Village Bank, not **VIKTOR DOMNENKO** or Paul Savenok. Pursuant to this "short sale" **VIKTOR DOMNENKO** and Paul Savenok would forfeit all ownership interest in this property and be relieved from paying Village Bank the approximate \$800,000.00 they owe Village Bank.

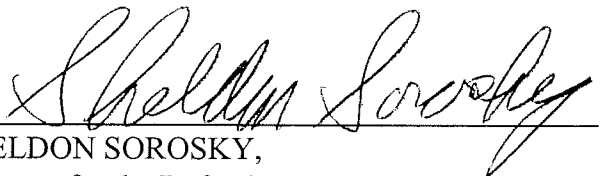
19. **VIKTOR DOMNENKO** is seeking the permission of this Court to participate in this real estate transaction.

20. Village Bank would like this transaction to occur; the bank wants to be unburdened from their ownership interest in this property.

**NO OBJECTION BY
THE GOVERNMENT**

21. The Government has reviewed these two proposed real estate transactions. The Government has no objection to these real estate transactions taking place.

Respectfully submitted,



SHELDON SOROSKY,
Attorney for the Defendant, **VIKTOR DOMENKO**

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